

STATE OF DELAWARE

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION
OF DELMARVA POWER & LIGHT COMPANY
FOR APPROVAL OF A MODIFIED FIXED
VARIABLE RATE DESIGN FOR NATURAL GAS
RATES (Filed June 25, 2009)

PSC Docket No. 09-277T

DIRECT TESTIMONY OF

ANDREA C. CRANE

ON BEHALF OF

THE DIVISION OF THE PUBLIC ADVOCATE

November 19, 2009

TABLE OF CONTENTS

	Page
I. Statement of Qualifications	3
II. Purpose of Testimony	4
III. Summary of Conclusions	5
IV. Discussion of the Issues	6
A. Background of the Proceeding	6
B. Description of the Company's Proposal	10
C. Impact on Customer Bills	14
D. Public Advocate Recommendations	16

Appendix A - List of Prior Testimonies

Appendix B - Referenced Data Requests

I. STATEMENT OF QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Andrea C. Crane and my business address is 199 Ethan Allen Highway, Ridgefield, CT 06877. (Mailing address: PO Box 810, Georgetown, CT 06829).

Q. By whom are you employed and in what capacity?

A. I am President of The Columbia Group, Inc.; a financial consulting firm that specializes in utility regulation. In this capacity, I analyze rate filings, prepare expert testimony, and undertake various studies relating to utility rates and regulatory policy. I have held several positions of increasing responsibility since I joined The Columbia Group, Inc. in January 1989. I became President of the firm in 2008.

Q. Please summarize your professional experience in the utility industry.

A. Prior to my association with The Columbia Group, Inc., I held the position of Economic Policy and Analysis Staff Manager for GTE Service Corporation, from December 1987 to January 1989. From June 1982 to September 1987, I was employed by various Bell Atlantic (now Verizon) subsidiaries. While at Bell Atlantic, I held assignments in the Product Management, Treasury, and Regulatory Departments.

Q. Have you previously testified in regulatory proceedings?

A. Yes, since joining The Columbia Group, Inc., I have testified in over 300 regulatory

1 proceedings in the states of Arizona, Arkansas, Connecticut, Delaware, Hawaii, Kansas,
2 Kentucky, Maryland, New Jersey, New Mexico, New York, Oklahoma, Pennsylvania,
3 Rhode Island, South Carolina, Vermont, West Virginia and the District of Columbia. These
4 proceedings involved gas, electric, water, wastewater, telephone, solid waste, cable
5 television, and navigation utilities. A list of dockets in which I have filed testimony is
6 included in Appendix A.

7
8 **Q. What is your educational background?**

9 A. I received a Master of Business Administration degree, with a concentration in Finance, from
10 Temple University in Philadelphia, Pennsylvania. My undergraduate degree is a B.A. in
11 Chemistry from Temple University.

12
13 **II. PURPOSE OF TESTIMONY**

14 **Q. What is the purpose of your testimony?**

15 A. On June 25, 2009, Delmarva Power and Light Company ("Company" or "DPL") filed an
16 Application with the Delaware Public Service Commission ("Commission" or "PSC")
17 requesting approval of a decoupling mechanism for the Company's natural gas delivery rate
18 structure. The Company stated that the purpose of this mechanism was to eliminate the
19 relationship between Delmarva's delivery revenue and the level of customer gas
20 consumption. The Company's proposed rate structure is intended to "better levelize and
21 stabilize recovery of delivery-related costs from all customer classes over the course of each

1 year.” The Columbia Group, Inc. was engaged by the Delaware Division of the Public
2 Advocate (“DPA”) to review the Company’s filing and to provide recommendations to the
3 PSC regarding its proposal.
4

5 **III. SUMMARY OF CONCLUSIONS**

6 **Q. What are your conclusions concerning the Company’s proposal for a modified fixed**
7 **variable rate structure for its natural gas delivery charges?**

8 A. Based on my analysis of the Company’s filing and other documentation in this case, my
9 conclusions are as follows:

- 10 1. To the extent that the Company’s delivery costs are fixed, I am not opposed to the
11 recovery of those costs through fixed charges.
- 12 2. The Company’s proposal provides a reasonable framework for a decoupled rate
13 structure that meets the requirements of the Delaware General Assembly.
- 14 3. The Company’s proposal will significantly reduce shareholder risk and should result
15 in lower return on equity awards by the PSC.
- 16 4. We do not have sufficient information to fully examine the impact of the Company’s
17 proposal on all affected rate classes. However, the rate impacts that we have
18 reviewed to date do not appear to result in unreasonable increases for Delaware
19 ratepayers.
- 20 5. The Company’s proposal to seasonally weight the delivery charge should be rejected.
- 21 6. The details of the Company’s proposal should be further examined in DPL’s next gas

base rate case, including its impact on class cost of service allocations.

7. The PSC should ensure that a comprehensive customer education program is in place prior to authorizing DPL to implement a modified fixed variable rate design.

IV. DISCUSSION OF THE ISSUES

A. Background of the Proceeding

Q. Please provide a brief background of this proceeding.

A. In its last natural gas base rate case, PSC Docket No. 06-284, DPL proposed a Bill Stabilization Adjustment ("BSA"), a decoupling mechanism that would have severed the relationship between gas revenues and gas sales. In that case, the Company proposed a monthly adjustment mechanism that would have compared the actual revenues collected each month with the revenues determined in its most recent base rate case, adjusted for changes in the number of customers. DPL proposed that any difference between the actual and baseline revenues would then be converted to a rate per Ccf and added to, or subtracted from, customers' bills in a subsequent month. The Company had proposed that the BSA be subject to an adjustment cap of +/- 10%. It had also proposed that adjustments exceeding this cap would be deferred to later months. DPL proposed this surcharge mechanism in order to compensate the Company between base rate cases for changes in consumption due to the Company's conservation efforts. The Company argued the most of its distribution costs are fixed costs, and therefore the Company's utility operating income declines when DPL is successful in promoting conservation.

1 In the Stipulation in that case, the parties agreed to “participate in any generic
2 statewide proceeding initiated by the Commission for the purpose of investigating Bill
3 Stabilization Adjustments or decoupling mechanisms for electric and gas distribution
4 utilities.”¹ The PSC subsequently initiated Regulation Docket No. 59 on March 27, 2007 to
5 address whether to implement a revenue decoupling mechanism for the electric and natural
6 gas utilities subject to the PSC’s jurisdiction.

7 Regulation Docket No. 59 was conducted as a series of workshops. The parties
8 simultaneously conducted workshops in PSC Docket No. 07-28, which addressed the
9 “Blueprint for the Future Application and Plan” that had been filed by DPL on February 6,
10 2007. PSC Docket No. 07-28 addressed the Company’s proposals with regard to demand-
11 side management (DSM”), advanced metering, revenue decoupling, and energy efficiency
12 plans. In PSC Regulation Docket No. 59, the Company proposed a revenue decoupling
13 surcharge mechanism, similar to the BSA that it had proposed in its prior rate case.

14 DPA fully participated in the workshops for Regulation Docket No. 59, including
15 making presentations and the filing of written comments. DPA opposed the decoupling
16 surcharge mechanism proposed by the Company, on several grounds. DPA opposed a
17 decoupling mechanism that would compensate a utility for a revenue deficiency caused by
18 factors other than measurable load reduction resulting from conservation efforts. DPA
19 argued that the surcharge mechanism sent the wrong price signals to customers. DPA also
20 argued that customer growth could offset the revenue impact of a decline in per customer
21 energy usage. DPA expressed concerns about the impact of a decoupling mechanism on

1 Stipulation in PSC Docket No. 06-284, page 4.

1 certain customers segments. DPA also noted that the proposed mechanism would lower the
2 Company's cost of capital, a fact that had not been fully taken into account by the Company
3 in its proposal.

4 In PSC Regulation Docket No. 59, Staff rejected the use of surcharges, but
5 recommended that the PSC consider a modified fixed variable method rate design as a
6 possible mechanism to remove disincentives to conservation efforts and to more
7 appropriately align fixed costs with the manner in which those costs are recovered.

8 On June 27, 2008, Hearing Examiner Ruth Ann Price issued the Findings and
9 Recommendations of the Hearing Examiner in PSC Regulation Docket No. 59 and Docket
10 07-28. Her recommendations with regard to the decoupling issue were as follows:

- 11 (a) The Commission should determine that implementation of surcharges for energy
12 efficiency programs and revenue deficiencies related to conservation efforts are not
13 the preferred approach, but that the Commission not preclude the potential use of
14 surcharges in the future under appropriate conditions;
- 15 (b) The Commission should investigate the potential implementation of a revenue
16 decoupling mechanism for each utility in the context of the respective company's
17 next base rate proceeding.²
- 18

19 The PSC primarily adopted the Hearing Examiner's Findings and Recommendations.

20 However, the PSC refined certain portions of those Findings and Recommendations, and

2 Findings and Recommendations of the Hearing Examiner, PSC Regulation Docket No. 59, June 27, 2008,
paragraph 44 (a) and 44 (b) .

1 addressed Staff's recommendation with regard to the use of the modified fixed variable rate
2 design, as follows:

3 The Commission approves the adoption of Staff's recommendations regarding the potential
4 adoption of a modified fixed variable rate design for Delaware distribution utilities in the
5 context of a rate case proceeding; however, the Commission maintains the flexibility to
6 address these rate design changes outside of a base rate case if the situation is warranted.³
7

8 **Q. Did the Delaware General Assembly subsequently address this issue?**

9 A. Yes, in late June 2009, the Delaware General Assembly adopted Senate Bill 106 and an
10 accompanying amendment, which required utilities to implement decoupling mechanisms by
11 December 2010. Specifically the legislation required that:

12 Decoupled rate design mechanisms will be implemented by no later than December 2010 for
13 regulated natural gas and electric utilities such that delivery rate structures provide for an
14 appropriate, cost-based level of revenue recovery which will remove disincentives to
15 investment in demand response programs and conservation and improved efficiency of
16 energy use.
17

18 This legislation was signed into law by Governor Jack Markell on July 29, 2009.
19

20 **Q. What was the Company's response to the Commission Order in PSC Regulation**
21 **Docket No. 59 and to the legislation that required decoupled rate design mechanisms to**
22 **be implemented by December 2010?**

23 A. Delmarva filed this docket proposing to implement a modified fixed variable rate design on
24 June 25, 2009, even prior to the final passage of Senate Bill 106. I assume that DPL was
25 well aware of the pending legislation when it prepared this filing. On June 25, 2009, DPL

3 Order in PSC Regulation Docket No. 59, September 16, 2008, page 5.

1 also filed a similar modified fixed variable rate structure proposal for its electric utility. That
2 filing has now been consolidated with the Company's currently pending electric base rate
3 case.

4
5 **B. Description of the Company's Proposal**

6 **Q. Please describe the major components of the Company's proposal.**

7 A. DPL is proposing to eliminate all volumetric billing for its gas distribution revenue
8 requirement. Instead of billing customers based on their usage, the Company is proposing to
9 implement a new two-part rate structure consisting of a monthly customer-related charge and
10 an annual demand-related charge. Demand costs would be recovered through a new billing
11 determinant, called the Design Day Contribution "(DDC") Factor. Commodity costs would
12 continue to be recovered on a volumetric basis.

13 Delmarva proposes that distribution costs be allocated between customer charges and
14 demand-related charges based on the results of the functional allocations in a cost of service
15 study. The customer charges would then be allocated over the number of customers in each
16 rate class to determine a monthly customer charge. The demand charges for each class
17 would be allocated over the aggregate DDC factor for each service classification to calculate
18 a DDC rate.

19 DPL proposes to calculate a specific DDC factor for each customer. The sum of
20 these individual DDC factors would then be aggregated and compared with the overall
21 aggregate demand for the class. A reconciliation process would be used to ensure that the

1 sum of the individual demands equaled the aggregated demand. In addition, the Company
2 plans to develop a DDC factor for each customer premise.
3

4 **Q. Is the new rate structure being proposed for all rate classes?**

5 A. No, it is not. The new rate structure is only being proposed for the Residential Gas Sales
6 Service (RG), General Gas Sales Service (GG), and General Volume Firm Transportation
7 Service (GVFT) classes of customers. According to page 5 of Mr. Janocha's testimony,
8 "Service classifications MVG, LVG, MVFT, and LVFT, which consist of the large industrial
9 and commercial users, currently have a customer and demand structure and the lighting
10 service classification GL currently has a fixed monthly charges (sic). The new rate design
11 approach is not being proposed for these service classifications at this time. However, the
12 Company may consider modifications to the rate design for these service classifications in
13 future proceedings."
14

15 **Q. How often will the individual DDC factors and DDC rates be calculated under the**
16 **Company's proposal?**

17 A. The Company is proposing that the DDC factor for each customer, and the DDC rates, would
18 be calculated as part of a base rate case. The Company is not proposing to change either a
19 customer's DDC factor or the DDC rate between base rate cases.
20

21 **Q How would the DDC charge be calculated for each customer?**

1 A. The DDC charge would be an annual charge, i.e., an individual DDC factor would be
2 calculated based on each customer's usage for the prior January and February billing months
3 and for the previous August. The January and February usage would be used to develop the
4 heating usage per degree day while the August usage would be used to determine the non-
5 heating baseline usage. The DDC factor would be weather-normalized based on actual
6 heating usage per degree day per customer and 65 design day degrees. Each customer's
7 DDC factor would then be multiplied by the DDC rate to determine the annual DDC charge
8 for each customer. Once all the individual DDC factors were determined and reconciled to
9 the aggregate DDC factors, the demand portion of each rate class's revenue requirement
10 would be divided by the total number of DDC factors in that class to determine a uniform
11 DDC rate for the class. That rate would remain in effect until the next base rate case.

12
13 **Q. Is the Company proposing to recover a uniform DDC charge each month?**

14 A. No, it is not. As stated, the DDC charge is an annual charge. However, a portion of the
15 charge will be collected each month, along with the monthly customer charge. DPL is
16 proposing to allocate the annual DDC charge differently depending on the month in
17 question. From January to March, customers would pay 16% of their annual DDC recovery
18 charge each month. From April to October, customers would pay 2.9% of the charge each
19 month. In November and December, customers would once again pay 16.0% of the charge.
20 Thus, over the course of a year, 100% of the charge would be collected.

1 **Q. Will the Company's proposal have any impact on class cost of service allocations?**

2 A. The Company stated in response to DPA 2-1 that the proposal is not expected to have any
3 impact on proposed cost of service allocations.
4

5 **Q. Is the Company proposing to implement this rate structure immediately?**

6 A. No. DPL is requesting conceptual approval of its rate design proposal. Assuming its
7 proposal is approved, the Company does not plan to implement the new rate design until its
8 next natural gas base rate case. The DDC factors and rates that are reflected in the
9 Company's filing are illustrative, based on the revenue requirement and allocations approved
10 in DPL's last base rate case for its natural gas operations, Docket No. 06-284. Based on the
11 revenue requirement approved in that case, DPL calculated the following rates:⁴
12

	RS	GG	GVFT
Customer Charge	\$15.74	\$46.64	\$321.63
DDC Rate (per Ccf)	\$22.27465	\$1.83316	\$1.83316

13
14 If the proposal is approved, the DDC factors and proposed DDC rate would be updated
15 when they initially implemented to reflect more recent actual the data from that rate case.
16

17 **C. Impact on Customer Bills**

18 **Q. What will be the impact of the proposed rate design on DPL's residential customers?**

⁴ In response to Staff DR 1-12, the Company stated that the data used to develop the GG rates was based on

1 A. While the Company's proposal is designed to be revenue neutral to the Company, the impact
2 on any specific customer will depend on that customer's individual DDC factor. Therefore,
3 the impact on customers will vary depending on the each customer's usage during the
4 months of January, February, and August. Usage in other months will not impact the DDC.

5 In Schedule JFJ-5, Mr. Janocha demonstrated that, under the Company's proposal, it
6 is expected that 77% of the residential customers will experience a total bill impact of plus or
7 minus 5%, ranging from a monthly rate increase of \$3.91 to a monthly rate reduction of
8 \$6.27. Moreover, this schedule indicates that 89% of all residential customers will
9 experience increases or decreases of plus or minus 10%, ranging from rate increases of \$4.91
10 to rate reductions of \$9.51 per month. A very small number of customers (0.38%) will have
11 a total bill reduction of more than a 10% reduction, averaging \$20.95. Under the Company's
12 proposal, approximately 10.31% of residential customers will experience bill impacts of
13 more than 10%, averaging an increase of \$5.45 per month.

14
15 **Q. Did the Company provide similar information to show the impact on residential**
16 **distribution rates?**

17 A. Yes, it did. As discussed in more detail below, distribution charges account for only about
18 25-35% of a residential customer's total bill. The majority of a customer's bill consists of
19 gas supply charges. Thus, examining the impact on a customer's total bill will understate the
20 impact of the Company's proposal on residential distribution rates.

1 In response to DPA 2-4, the Company provided several schedules showing the
2 expected impact of its proposal on distribution costs. As shown in this response, 36% of
3 the residential customers will experience a distribution impact of plus or minus 5%, ranging
4 from a monthly rate increase of \$1.68 to a monthly rate reduction of \$1.74. This response
5 also indicates that 61% of all residential customers will experience increases or decreases of
6 plus or minus 10%, ranging from rate increases of \$2.87 to rate reductions of \$3.28 per
7 month. Approximately 13.02% of residential customers are expected to have distribution
8 cost reductions of more than 10%, averaging \$7.53 per month. However, 26.12% of
9 residential customers will have distribution increases of more than 10%, and these increases
10 average \$4.75 per month.

11
12 **Q. Did the Company provide similar information for the GG and GVFT rate classes?**

13 **A.** In its filing, the Company did not provide any information about the impact of its proposal
14 on the non-residential customer classes. In response to requests from both DPA and Staff,
15 the Company did provide information about the expected impact on the total bill for the GG
16 class. This information was not provided until November 12, 2009 and therefore we have
17 had limited opportunity to review it. However, the Company's response indicates that
18 23.03% of the general gas sales service customers will experience a total bill impact of plus
19 or minus 5%, ranging from a monthly rate increase of \$39.82 to a monthly rate reduction of
20 \$89.35. This response also indicates that 46.16% of general gas sales service customers will
21 experience increases or decreases of plus or minus 10%, ranging from rate increases of

1 \$43.94 per month to rate reductions of \$122.20 per month. Approximately 8.72% of general
2 gas sales service customers are expected to have total bill reductions of more than 10%,
3 averaging \$176.49 per month. Although the Company's response indicates that 45.12% of
4 gas sales service customers will have total bill increases of more than 10%, the Company
5 indicated that the vast majority of these customers are low-volume customers and that the
6 percentage increases, while large on a percentage basis, only average \$25.21 per month.

7
8 **D. Public Advocate Recommendations**

9 **Q. Do you recommend that the Company's modified fixed variable rate structure proposal**
10 **be adopted by the PSC?**

11 **A.** As noted above, the Delaware General Assembly has mandated that Delaware electric and
12 gas utilities adopt some form of decoupling mechanism by December 31, 2010. The
13 Company's proposal is far superior to the BSA that DPL proposed in its last base rate case
14 and in PSC Regulation Docket No. 59. The Company's proposal will result in a ratemaking
15 methodology that more closely matches the current regulatory framework, whereby base
16 rates are established in a base rate case proceeding and remain unchanged between base rate
17 case filings. The true-up mechanism in the BSA sent the wrong price signals to customers
18 by imposing higher surcharges as customers increased their conservation efforts. The current
19 proposal does not require an annual true-up mechanism and it much easier to administer than
20 the proposed BSA. Finally, based on the information that has been provided to date, it does
21 not appear that residential or general service customers will experience unacceptable rate

1 increases as a result of this proposal. For these reasons, I am generally supportive of the
2 Company's proposal. However, I do have some concerns about the Company's proposal, as
3 discussed below. Specifically, I have concerns about a) lack of comprehensive information
4 about the impact on various customers, b) the seasonal weighting proposed for the
5 distribution of DDC revenues, c) the impact of the proposal on the Company's overall cost
6 of capital, and d) the lack of a detailed customer education program.

7
8 **Q. Does the Company's filing provide all the information necessary to conduct a**
9 **comprehensive review of its proposal?**

10 A. No, it does not. The Company's filing provided only a broad outline of its proposal.
11 Additional information was requested by both Staff and DPA, each of whom propounded
12 two rounds of discovery. Some information was provided very recently making a
13 comprehensive analysis difficult. Other information is yet to be provided, such as the impact
14 of the Company's proposal on the distribution portion of the general gas service customer's
15 bill, the Company's proposed tariff, and the Company's proposal to educate customers about
16 this significant rate design change. We also do not have customer impact data for the GVFT
17 class. In summary, there are still unanswered questions about the Company's proposal that
18 need to be resolved before the Commission can fully endorse the modified fixed variable rate
19 structure proposal put forth by DPL. Since the Company is not proposing to implement its
20 proposed rate design until its next natural gas base rate case, the parties have an opportunity
21 to address these issues further in the Company's next base rate case.

1
2 **Q. Please discuss your concerns regarding the seasonal weighting proposed by the**
3 **Company for residential customers.**

4 A. DPL is proposing to calculate an annual DCF charge, which would then be billed to RG
5 customers according to the following schedule:
6

Month	Percentage of DDC Billed
January	16.0%
February	16.0%
March	16.0%
April	2.9%
May	2.9%
June	2.9%
July	2.9%
August	2.9%
September	2.9%
October	2.9%
November	16.0%
December	16.0%

7
8 The Company is not proposing a seasonal weighting for the GG or GVFT classes. Mr.
9 Janocha stated on page 6 of his testimony that the proposed seasonal distribution was being
10 made "in an effort to continue to provide customers with a seasonal pricing signal."
11 However, given the fixed rate nature of the proposed DDC charge, there is no "seasonal
12 pricing signal" that needs to be sent to customers. Any seasonal pricing signal will result
13 from the higher commodity costs that customers will pay in the winter months and that
14 pricing signal is not impacted by the Company's rate structure proposal. Moreover, the

1 Company's proposal shifts recovery from the summer months, when the commodity portion
2 of the bills is generally lower, to the winter months, thereby further increasing costs during
3 the winter months. This strategy seems to be in conflict with the Commission's goal to
4 promote budget billing in order to smooth out fluctuations in bills from month-to-month.
5

6 **Q. Didn't the Company also state that its proposed distribution of revenue recovery was**
7 **intended to "assure that heating customers who seasonally disconnect service**
8 **contribute appropriately to the recovery of fixed annual costs."**

9 **A.** Yes, DPL did state in response to DPA 2-14 that it has observed an increasing trend among
10 small customers to have gas service cut off in the spring and turned on again in the fall.
11 However, this argument assumes that most seasonal customers are heating customers that
12 receive the bulk of service in the winter months. The Company has not provided any
13 documentation to support this claim. I would expect there to also be seasonal customers in
14 the summer months. The Company's proposal would result in these customers paying only
15 2.9% of their annual DDC charge each month instead of the 8.3% that would be charged if
16 the DDF were recovered on a uniform basis.

17 The Company's average residential DDF charge is approximately \$207. Under the
18 Company's proposal, customers would be charged \$33.12 in the winter months and \$6.00 in
19 the summer months. Under a uniform recovery mechanism, ratepayers would be charged
20 \$17.25 per month all year round. Thus, customers that leave in the winter would be saving
21 \$15.87 while customers that leave in the summer would be saving \$11.25. Therefore, the

1 Company's proposal provides the greatest economic benefit to the seasonal summer
2 customers that shuts off service in the winter months, exactly the opposite of the Company's
3 stated concern, based on my example. However, this one example reflects average savings
4 for one customer. The Company has not provided detailed information about the number of
5 seasonal customers who shut off service, or the frequency with which customers request
6 seasonal shut-offs.

7
8 **Q. What do you recommend?**

9 A. Unless the Company can make a compelling case on rebuttal that its seasonal heating
10 customers will have a serious detrimental effect on collection of its revenue requirement, I
11 recommend that the PSC adopt uniform rates throughout the year. This is consistent with the
12 Company's argument that fixed costs should be recovered in a fixed manner. It is also
13 consistent with the Commissions' policy to promote budget billing as mechanism to mitigate
14 monthly price fluctuations.

15
16 **Q. What impact will your recommendation have on the monthly bills of residential**
17 **customers?**

18 A. In response to DPA 2-7 (Updated 11/12/09), the Company provided data showing average
19 residential heating customer bills under existing rates and under the Company's proposal,
20 assuming the seasonal distribution factor. I have updated this response to show the impact
21 using a uniform DDC each month. The results are as follows:

Month	Company Proposal	Uniform Distribution
January	\$186.58	\$170.82
February	\$173.85	\$158.09
March	\$174.48	\$158.72
April	\$109.06	\$120.23
May	\$63.45	\$74.62
June	\$46.93	\$58.10
July	\$37.59	\$48.76
August	\$35.16	\$46.33
September	\$35.92	\$47.09
October	\$38.82	\$50.99
November	\$97.91	\$82.14
December	\$160.36	\$144.60

As shown above, my recommendation will tend to smooth out monthly bills. However, under my proposal, there will still be price signals sent to customers as a result of higher bills dues to higher commodity usage.

Q. How will new customers be billed under the Company's proposal?

A. New customers moving into a new premise would be billed at the class average DDC factor for each class. Since the Company will be calculating a DDC for each premise, new or existing customers moving into an existing premise will be billed at the current DDC factor of that premise.

Q. Does the DPA have any concerns with the Company's proposals for determining the DDC factor for new customers?

1 **A.** While the DPA recognizes that this methodology is imprecise, we believe that it is a
2 reasonable proposal. With regard to existing premises, the current DDC should provide a
3 good estimate of demand for the new ratepayer, particularly with regard to residential
4 customers. The Company's proposal to utilize the class average DDC for new customers
5 moving into a new premise is likely to be less precise. There are likely to be customers
6 moving into small seasonal new homes or new more efficient homes whose actual DDC will
7 be below the class average. However, these customers should benefit from the lower costs
8 of a simple and easy implementation system. If the Commission is uncomfortable with this
9 proposal, it could require that the Company calculate a DDC after it has one year of historic
10 data on new customers that move into a new premise.

11
12 **Q.** How will revenues from new customers be treated?

13 **A.** Unless there has been cost increases since the last base rate case, all distribution revenue
14 from new customers will accrue to the benefit of shareholders. This is similar to the
15 situation that exists today. The PSC should continue to monitor the Company's earnings
16 between base rate case proceedings to ensure that growth in customers, or other factors, do
17 not result in excessive earnings. If the PSC finds that the modified fixed variable rate
18 structure, or any other factor, is resulting in over-earnings by the Company, it can and should
19 take appropriate steps to initiate a rate investigation.

1 **Q. Will customers be able to “game the system” by controlling their usage during certain**
2 **months of the year?**

3 A. Since a customer’s DDC will be based on their usage during the months of January and
4 February relative to the month of August, theoretically a customer could manipulate the
5 DDC factor by specific actions taken in those months. For example, a customer could
6 reduce usage in January and February, thereby reducing their DDC factor, but increase usage
7 in the other months, resulting in a net increase in overall gas consumption. However, the
8 likelihood of customers actually taking such an action will be small, especially if customers
9 understand that the DDC factor will only be reset in a base rate case. Therefore, changes in
10 usage between base rate case proceedings will not impact the customer’s DDC factor.

11
12 **Q. What impact will the Company’s proposal have on its costs?**

13 A. Adoption of the Company’s proposal will result in a significant reduction in the Company’s
14 cost of capital. This proposal will greatly reduce shareholder risk, which has already been
15 largely eliminated by the adoption of recovery clauses and other mechanisms that guarantee
16 the utility dollar-for-dollar recovery.

17
18 **Q. How much of DPL’s natural gas revenue requirement is currently at risk?**

19 A. As shown in the response to DPA 1-9, the majority of the Company’s revenue requirement
20 relates to gas costs that are already recovered on a dollar-for-dollar basis from ratepayers.

1 As shown in that response, 65% to 75% of the Company's revenues relate to gas cost
2 recovery.

	Residential GCR/Total Revenues	General Service GCR/Total Revenue
2006	70.2%	75.2%
2007	66.6%	71.6%
2008	64.6%	70.0%

3
4 Thus, shareholder risk has already been largely eliminated. In addition to a gas cost
5 surcharge, the Company also has an environmental surcharge rider. Thus, the Company is
6 already protected from fluctuations in either revenues or costs for the vast majority of its
7 expenditures.

8 The only portion of its revenue requirement for which the Company is still at risk is
9 the delivery revenue that is currently collected on a volumetric basis. This is only a portion
10 of the total delivery revenues currently being collected from ratepayers. All customer
11 charges and customer demand charges are already recovered on a fixed basis. If a modified
12 fixed variable rate structure is adopted, the Company and its shareholders will be even more
13 insulated from business risk, a factor that must be considered when establishing a reasonable
14 cost of equity for DPL.

15 There are basically two risks faced by utilities: revenue risk and expense risk. The
16 Company has already eliminated the vast majority of its revenue and expense risk through
17 implementation of the GCR and other surcharges. Since a modified fixed variable rate
18 structure would remove virtually all of the Company's revenue risk, then there should be a

1 commensurate reduction to cost of equity. If the Commission adopts a modified fixed
2 variable rate structure, then I recommend that the Commission reduce the equity premium
3 that would otherwise be reflected in rates by 50%. For example, if the Company has a cost
4 of debt of 5.0% and a cost of equity based on traditional valuation methods of 10%, then the
5 equity carries a premium of 5% over the cost of debt. In setting an overall cost of capital for
6 DPL in its next base rate case, I recommend that this differential be reduced by 50%,
7 resulting in a cost of equity for DPL of 7.50%. This example is for illustration only.
8 Obviously, the individual components of the Company's cost of capital should be established
9 in a base rate case proceeding. Nevertheless, if a modified fixed variable rate design is
10 implemented, the PSC should significantly reduce the cost of equity that it awards to DPL.
11

12 **Q. Has the Company determined the impact on cost of capital of its proposal?**

13 A. No, it has not. In response to DPA 1-7, the Company stated that it "has not reflected any
14 impact on the cost of capital as a result of this rate design proposal." In its current electric
15 base rate case, DPL's cost of capital witness has proposed a 25 basis point reduction in the
16 cost of equity if the proposed modified fixed variable rate structure is adopted in that case.
17 Obviously, this adjustment is inadequate given the significant reduction in risk that results
18 from the new rate structure.
19

20 **Q. Are there additional issues that should be examined in the Company's next base rate**
21 **case?**

1 A. Yes. The Company has stated that it expects its modified fixed variable rate structure
2 proposal to have no impact on class cost of service allocations. I do not believe that this
3 issue has been fully examined by the parties in this case. DPA would oppose any shifting of
4 costs among classes that may result from the implementation of this new rate structure. In
5 the Company's next base rate case, the parties should examine this issue more closely and
6 ensure that any new rate structure will not result in any reallocation of the Company's
7 revenue requirement among rate classes.

8 In addition, the Company's proposal is based on the underlying premise that its
9 delivery costs are fixed, and that all delivery costs can be functionalized to either the
10 customer charge or to demand. By conceptually accepting the modified fixed variable rate
11 structure proposal, I am not drawing any conclusions about these underlying assumptions, or
12 about the respective allocation of costs between the customer and demand components.
13 Moreover, to the extent that any party identifies variable delivery costs in the Company's
14 revenue requirement, it may be necessary to modify the Company's proposal to provide for
15 usage-based recovery of such costs in future rate proceedings.

16
17 **Q. What do you see as the biggest challenge to implementation of the Company's proposed**
18 **modified fixed variable rate structure?**

19 A. I believe that the biggest challenge will be customer education. The Company has not
20 prepared any customer education materials at this time. In response to Staff 1-5, DPL
21 indicated that "Depending on the outcome of this proceeding, the Company will work with

1 Staff and DPA in developing educational materials to explain the modified fixed variable
2 rate design to Customers.” I believe that there could be significant customer confusion when
3 a new modified fixed variable rate design is implemented. Therefore, it is critical that no
4 rate design change be implemented unless and until the Company can demonstrate to the
5 PSC that it has prepared a comprehensive education program for customers, and that it has
6 adequate resources to address the many inquiries and complaints from customers that it is
7 likely to receive.

8
9 **Q. Does this complete your testimony?**

10 **A. Yes, it does.**

APPENDIX A

LIST OF PRIOR TESTIMONIES

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Mid-Kansas Electric Company	E	Kansas	09-MKEE-969-RTS	10/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Westar Energy, Inc.	E	Kansas	09-WSEE-925-RTS	9/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08050326 EO08080542	8/09	Demand Response Programs	Division of Rate Counsel
Public Service Electric and Gas Company	E	New Jersey	EO09030249	7/09	Solar Loan II Program	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	09-MDWE-792-RTS	7/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Westar Energy and KG&E	E	Kansas	09-WSEE-641-GIE	6/09	Rate Consolidation	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	09-60	6/09	Cost of Capital	Division of the Public Advocate
Rockland Electric Company	E	New Jersey	GO09020097	6/09	SREC-Based Financing Program	Division of Rate Counsel
Tidewater Utilities, Inc.	W	Delaware	09-29	6/09	Revenue Requirements Cost of Capital	Division of the Public Advocate
Chesapeake Utilities Corporation	G	Delaware	08-269F	3/09	Gas Service Rates	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	08-266F	2/09	Gas Cost Rates	Division of the Public Advocate
Kansas City Power & Light Company	E	Kansas	09-KCPE-246-RTS	2/09	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08090840	1/09	Solar Financing Program	Division of Rate Counsel
Atlantic City Electric Company	E	New Jersey	EO06100744 EO08100875	1/09	Solar Financing Program	Division of Rate Counsel
West Virginia-American Water Company	W	West Virginia	08-0900-W-42T	11/08	Revenue Requirements	The Consumer Advocate Division of the PSC
Westar Energy, Inc.	E	Kansas	08-WSEE-1041-RTS	9/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Artesian Water Company	W	Delaware	08-96	9/08	Cost of Capital, Revenue, New Headquarters	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR08020113	9/08	Form 1205 Equipment & Installation Rates	Division of Rate Counsel
Pawtucket Water Supply Board	W	Rhode Island	3945	7/08	Revenue Requirements	Division of Public Utilities and Carriers
New Jersey American Water Co.	WWW	New Jersey	WR08010020	7/08	Consolidated Income Taxes	Division of Rate Counsel
New Jersey Natural Gas Company	G	New Jersey	GR07110889	5/08	Revenue Requirements	Division of Rate Counsel
Kansas Electric Power Cooperative, Inc.	E	Kansas	08-KEPE-597-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Public Service Electric and Gas Company	E	New Jersey	EX02060363 EA02060366	5/08	Deferred Balances Audit	Division of Rate Counsel
Cablevision Systems Corporation	C	New Jersey	CR07110894, et al.	5/08	Forms 1240 and 1205	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	08-MDWE-594-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	07-246F	4/08	Gas Service Rates	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR07100717-946	3/08	Form 1240	Division of Rate Counsel
Generic Commission Investigation	G	New Mexico	07-00340-UT	3/08	Weather Normalization	New Mexico Office of Attorney General
Southwestern Public Service Company	E	New Mexico	07-00319-UT	3/08	Revenue Requirements Cost of Capital	New Mexico Office of Attorney General
Delmarva Power and Light Company	G	Delaware	07-239F	2/08	Gas Cost Rates	Division of the Public Advocate
Atmos Energy Corp.	G	Kansas	08-ATMG-280-RTS	1/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Aquila /Black Hills / Kansas City Power & Light	G	Kansas	07-BHCG-1063-ACQ 07-KCPE-1064-ACQ	12/07	Utility Acquisitions	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	07-186	12/07	Cost of Capital Regulatory Policy	Division of the Public Advocate
Westar Energy, Inc.	E	Kansas	08-WSEE-309-PRE	11/07	Predetermination of Wind Generation	Citizens' Utility Ratepayer Board
Public Service Electric and Gas Company	E/G	New Jersey	ER07050303 GR07050304	11/07	Societal Benefits Charge	Division of Rate Counsel
Public Service Company of New Mexico	E	New Mexico	07-00077-UT	10/07	Revenue Requirements Cost of Capital	New Mexico Office of Attorney General
Public Service Electric and Gas Company	E	New Jersey	EO07040278	9/07	Solar Cost Recovery	Division of Rate Counsel
Comcast Cable	C	New Jersey	CR07030147	8/07	Form 1205	Division of Rate Counsel
Kansas City Power & Light Company	E	Kansas	07-KCPE-905-RTS	8/07	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Cablevision Systems Corporation	C	New Jersey	CR06110781, et al.	5/07	Cable Rates - Forms 1205 and 1240	Division of Rate Counsel
Westar Energy, Inc.	E	Kansas	05-WSEE-981-RTS	4/07	Revenue Requirements Issues on Remand	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	G	Delaware	06-285F	4/07	Gas Cost Rates	Division of the Public Advocate
Comcast of Jersey City, et al.	C	New Jersey	CR06070558	4/07	Cable Rates	Division of Rate Counsel
Westar Energy	E	Kansas	07-WSEE-616-PRE	3/07	Pre-Approval of Generation Facilities	Citizens' Utility Ratepayer Board
Woonsocket Water Division	W	Rhode Island	3800	3/07	Revenue Requirements	Division of Public Utilities and Carriers

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Aquila - KGO	G	Kansas	07-AQLG-431-RTS	3/07	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	06-287F	3/07	Gas Service Rates	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	06-284	1/07	Revenue Requirements Cost of Capital	Division of the Public Advocate
El Paso Electric Company	E	New Mexico	06-00258 UT	11/06	Revenue Requirements	New Mexico Office of Attorney General
Aquila, Inc. / Mid-Kansas Electric Co.	E	Kansas	06-MKEE-524-ACQ	11/06	Proposed Acquisition	Citizens' Utility Ratepayer Board
Public Service Company of New Mexico	G	New Mexico	06-00210-UT	11/06	Revenue Requirements	New Mexico Office of Attorney General
Atlantic City Electric Company	E	New Jersey	EM06090638	11/06	Sale of B.L. England	Division of Rate Counsel
United Water Delaware, Inc.	W	Delaware	06-174	10/06	Revenue Requirements Cost of Capital	Division of the Public Advocate
Public Service Electric and Gas Company	G	New Jersey	GR05080696	10/06	Societal Benefits Charge	Division of Rate Counsel
Comcast (Avalon, Maple Shade, Gloucester)	C	New Jersey	CR06030136-139	10/06	Form 1205 and 1240 Cable Rates	Division of Rate Counsel
Kansas Gas Service	G	Kansas	06-KGSG-1209-RTS	9/06	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
New Jersey American Water Co. Elizabethtown Water Company Mount Holly Water Company	W	New Jersey	WR06030257	9/06	Regulatory Policy Taxes Cash Working Capital	Division of Rate Counsel
Tidewater Utilities, Inc.	W	Delaware	06-145	9/06	Revenue Requirements Cost of Capital	Division of the Public Advocate
Artesian Water Company	W	Delaware	06-158	9/06	Revenue Requirements Cost of Capital	Division of the Public Advocate
Kansas City Power & Light Company	E	Kansas	06-KCPE-828-RTS	8/06	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Midwest Energy, Inc.	G	Kansas	06-MDWG-1027-RTS	7/06	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	05-315F	6/06	Gas Service Rates	Division of the Public Advocate
Cablevision Systems Corporation	C	New Jersey	CR05110924, et al.	5/06	Cable Rates - Forms 1205 and 1240	Division of the Ratepayer Advocate
Montague Sewer Company	WW	New Jersey	WR05121056	5/06	Revenue Requirements	Division of the Ratepayer Advocate
Comcast of South Jersey	C	New Jersey	CR05119035, et al.	5/06	Cable Rates - Form 1240	Division of the Ratepayer Advocate
Comcast of New Jersey	C	New Jersey	CR05090826-827	4/06	Cable Rates - Form 1240	Division of the Ratepayer Advocate
Parkway Water Company	W	New Jersey	WR05070634	3/06	Revenue Requirements Cost of Capital	Division of the Ratepayer Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Aqua Pennsylvania, Inc.	W	Pennsylvania	R-00051030	2/06	Revenue Requirements	Office of Consumer Advocate
Delmarva Power and Light Company	G	Delaware	05-312F	2/05	Gas Cost Rates	Division of the Public Advocate
Delmarva Power and Light Company	E	Delaware	05-304	12/05	Revenue Requirements Cost of Capital	Division of the Public Advocate
Artesian Water Company	W	Delaware	04-42	10/05	Revenue Requirements Cost of Capital (Remand)	Division of the Public Advocate
Utility Systems, Inc.	WW	Delaware	335-05	9/05	Regulatory Policy	Division of the Ratepayer Advocate
Westar Energy, Inc.	E	Kansas	05-WSEE-981-RTS	9/05	Revenue Requirements	Citizens' Utility Ratepayer Board
Empire District Electric Company	E	Kansas	05-EPDE-980-RTS	8/05	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Comcast Cable	C	New Jersey	CR05030186	8/05	Form 1205	Division of the Ratepayer Advocate
Pawtucket Water Supply Board	W	Rhode Island	3674	7/05	Revenue Requirements	Division of Public Utilities and Carriers
Delmarva Power and Light Company	E	Delaware	04-391	7/05	Standard Offer Service	Division of the Public Advocate
Patriot Media & Communications CNJ, LLC	C	New Jersey	CR04111453-455	6/05	Cable Rates	Division of the Ratepayer Advocate
Cablevision	C	New Jersey	CR04111379, et al.	6/05	Cable Rates	Division of the Ratepayer Advocate
Comcast of Mercer County, LLC	C	New Jersey	CR04111458	6/05	Cable Rates	Division of the Ratepayer Advocate
Comcast of South Jersey, LLC, et al.	C	New Jersey	CR04101356, et al.	5/05	Cable Rates	Division of the Ratepayer Advocate
Comcast of Central New Jersey LLC, et al.	C	New Jersey	CR04101077, et al.	4/05	Cable Rates	Division of the Ratepayer Advocate
Kent County Water Authority	W	Rhode Island	3660	4/05	Revenue Requirements	Division of Public Utilities and Carriers
Aquila, Inc.	G	Kansas	05-AQLG-367-RTS	3/05	Revenue Requirements Cost of Capital Tariff Issues	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	04-334F	3/05	Gas Service Rates	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	04-301F	3/05	Gas Cost Rates	Division of the Public Advocate
Delaware Electric Cooperative, Inc.	E	Delaware	04-288	12/04	Revenue Requirements Cost of Capital	Division of the Public Advocate
Public Service Company of New Mexico	E	New Mexico	04-00311-UT	11/04	Renewable Energy Plans	Office of the New Mexico Attorney General

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Woonsocket Water Division	W	Rhode Island	3626	10/04	Revenue Requirements	Division of Public Utilities and Carriers
Aquila, Inc.	E	Kansas	04-AQLE-1065-RTS	10/04	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	04-121	8/04	Conservation Rates (Affidavit)	Division of the Public Advocate
Atlantic City Electric Company	E	New Jersey	ER03020110 PUC 06061-2003S	8/04	Deferred Balance Phase II	Division of the Ratepayer Advocate
Kentucky American Water Company	W	Kentucky	2004-00103	8/04	Revenue Requirements	Office of Rate Intervention of the Attorney General
Shorelands Water Company	W	New Jersey	WR04040295	8/04	Revenue Requirements Cost of Capital	Division of the Ratepayer Advocate
Artesian Water Company	W	Delaware	04-42	8/04	Revenue Requirements Cost of Capital	Division of the Public Advocate
Long Neck Water Company	W	Delaware	04-31	7/04	Cost of Equity	Division of the Public Advocate
Tidewater Utilities, Inc.	W	Delaware	04-152	7/04	Cost of Capital	Division of the Public Advocate
Cablevision	C	New Jersey	CR03100850, et al.	6/04	Cable Rates	Division of the Ratepayer Advocate
Montague Water and Sewer Companies	W/WW	New Jersey	WR03121034 (W) WR03121035 (S)	5/04	Revenue Requirements	Division of the Ratepayer Advocate
Comcast of South Jersey, Inc.	C	New Jersey	CR03100876,77,79,80	5/04	Form 1240 Cable Rates	Division of the Ratepayer Advocate
Comcast of Central New Jersey, et al.	C	New Jersey	CR03100749-750 CR03100759-762	4/04	Cable Rates	Division of the Ratepayer Advocate
Time Warner	C	New Jersey	CR03100763-764	4/04	Cable Rates	Division of the Ratepayer Advocate
Interstate Navigation Company	N	Rhode Island	3573	3/04	Revenue Requirements	Division of Public Utilities and Carriers
Aqua Pennsylvania, Inc.	W	Pennsylvania	R-00038805	2/04	Revenue Requirements	Pennsylvania Office of Consumer Advocate
Comcast of Jersey City, et al.	C	New Jersey	CR03080598-601	2/04	Cable Rates	Division of the Ratepayer Advocate
Delmarva Power and Light Company	G	Delaware	03-378F	2/04	Fuel Clause	Division of the Public Advocate
Atmos Energy Corp.	G	Kansas	03-ATMG-1036-RTS	11/03	Revenue Requirements	Citizens' Utility Ratepayer Board
Aquila, Inc. (UCU)	G	Kansas	02-UTCG-701-GIG	10/03	Using utility assets as collateral	Citizens' Utility Ratepayer Board
CenturyTel of Northwest Arkansas, LLC	T	Arkansas	03-041-U	10/03	Affiliated Interests	The Arkansas Public Service Commission General Staff

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Borough of Butler Electric Utility	E	New Jersey	CR03010049/63	9/03	Revenue Requirements	Division of the Ratepayer Advocate
Comcast Cablevision of Avalon Comcast Cable Communications	C	New Jersey	CR03020131-132	9/03	Cable Rates	Division of the Ratepayer Advocate
Delmarva Power and Light Company d/b/a Conectiv Power Delivery	E	Delaware	03-127	8/03	Revenue Requirements	Division of the Public Advocate
Kansas Gas Service	G	Kansas	03-KGSG-602-RTS	7/03	Revenue Requirements	Citizens' Utility Ratepayer Board
Washington Gas Light Company	G	Maryland	8959	6/03	Cost of Capital Incentive Rate Plan	U.S. DOD/FEA
Pawtucket Water Supply Board	W	Rhode Island	3497	6/03	Revenue Requirements	Division of Public Utilities and Carriers
Atlantic City Electric Company	E	New Jersey	EO03020091	5/03	Stranded Costs	Division of the Ratepayer Advocate
Public Service Company of New Mexico	G	New Mexico	03-000-17 UT	5/03	Cost of Capital Cost Allocations	Office of the New Mexico Attorney General
Comcast - Hopewell, et al.	C	New Jersey	CR02110818 CR02110823-825	5/03	Cable Rates	Division of the Ratepayer Advocate
Cablevision Systems Corporation	C	New Jersey	CR02110838, 43-50	4/03	Cable Rates	Division of the Ratepayer Advocate
Comcast-Garden State / Northwest	C	New Jersey	CR02100715 CR02100719	4/03	Cable Rates	Division of the Ratepayer Advocate
Midwest Energy, Inc. and Westar Energy, Inc.	E	Kansas	03-MDWE-421-ACQ	4/03	Acquisition	Citizens' Utility Ratepayer Board
Time Warner Cable	C	New Jersey	CR02100722 CR02100723	4/03	Cable Rates	Division of the Ratepayer Advocate
Westar Energy, Inc.	E	Kansas	01-WSRE-949-GIE	3/03	Restructuring Plan	Citizens' Utility Ratepayer Board
Public Service Electric and Gas Company	E	New Jersey	ER02080604 PUC 7983-02	1/03	Deferred Balance	Division of the Ratepayer Advocate
Atlantic City Electric Company d/b/a Conectiv Power Delivery	E	New Jersey	ER02080510 PUC 6917-02S	1/03	Deferred Balance	Division of the Ratepayer Advocate
Wallkill Sewer Company	WW	New Jersey	WR02030193 WR02030194	12/02	Revenue Requirements Purchased Sewage Treatment Adj. (PSTAC)	Division of the Ratepayer Advocate
Midwest Energy, Inc.	E	Kansas	03-MDWE-001-RTS	12/02	Revenue Requirements	Citizens' Utility Ratepayer Board
Comcast-LBI Crestwood	C	New Jersey	CR02050272 CR02050270	11/02	Cable Rates	Division of the Ratepayer Advocate
Reliant Energy Arkla	G	Oklahoma	PUD200200166	10/02	Affiliated Interest Transactions	Oklahoma Corporation Commission, Public Utility Division Staff
Midwest Energy, Inc.	G	Kansas	02-MDWG-922-RTS	10/02	Gas Rates	Citizens' Utility Ratepayer Board

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Comcast Cablevision of Avalon	C	New Jersey	CR02030134 CR02030137	7/02	Cable Rates	Division of the Ratepayer Advocate
RCN Telecom Services, Inc., and Home Link Communications	C	New Jersey	CR02010044, CR02010047	7/02	Cable Rates	Division of the Ratepayer Advocate
Washington Gas Light Company	G	Maryland	8920	7/02	Rate of Return Rate Design (Rebuttal)	General Services Administration (GSA)
Chesapeake Utilities Corporation	G	Delaware	01-307, Phase II	7/02	Rate Design Tariff Issues	Division of the Public Advocate
Washington Gas Light Company	G	Maryland	8920	6/02	Rate of Return Rate Design	General Services Administration (GSA)
Tidewater Utilities, Inc.	W	Delaware	02-28	6/02	Revenue Requirements	Division of the Public Advocate
Western Resources, Inc.	E	Kansas	01-WSRE-949-GIE	5/02	Financial Plan	Citizens' Utility Ratepayer Board
Empire District Electric Company	E	Kansas	02-EPDE-488-RTS	5/02	Revenue Requirements	Citizens' Utility Ratepayer Board
Southwestern Public Service Company	E	New Mexico	3709	4/02	Fuel Costs	Office of the New Mexico Attorney General
Cablevision Systems	C	New Jersey	CR01110706, et al	4/02	Cable Rates	Division of the Ratepayer Advocate
Potomac Electric Power Company	E	District of Columbia	945, Phase II	4/02	Divestiture Procedures	General Services Administration (GSA)
Vermont Yankee Nuclear Power Corp.	E	Vermont	6545	3/02	Sale of VY to Entergy Corp. (Supplemental)	Department of Public Service
Delmarva Power and Light Company	G	Delaware	01-348F	1/02	Gas Cost Adjustment	Division of the Public Advocate
Vermont Yankee Nuclear Power Corp.	E	Vermont	6545	1/02	Sale of VY to Entergy Corp.	Department of Public Service
Pawtucket Water Supply Company	W	Rhode Island	3378	12/01	Revenue Requirements	Division of Public Utilities and Carriers
Chesapeake Utilities Corporation	G	Delaware	01-307, Phase I	12/01	Revenue Requirements	Division of the Public Advocate
Potomac Electric Power Company	E	Maryland	8796	12/01	Divestiture Procedures	General Services Administration (GSA)
Kansas Electric Power Cooperative	E	Kansas	01-KEPE-1106-RTS	11/01	Depreciation Methodology (Cross Answering)	Citizens' Utility Ratepayer Board
Wellsboro Electric Company	E	Pennsylvania	R-00016356	11/01	Revenue Requirements	Office of Consumer Advocate
Kent County Water Authority	W	Rhode Island	3311	10/01	Revenue Requirements (Surrebuttal)	Division of Public Utilities and Carriers
Pepco and New RC, Inc.	E	District of Columbia	1002	10/01	Merger Issues and Performance Standards	General Services Administration (GSA)

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Potomac Electric Power Co. & Delmarva Power	E	Delaware	01-194	10/01	Merger Issues and Performance Standards	Division of the Public Advocate
Yankee Gas Company	G	Connecticut	01-05-19PH01	9/01	Affiliated Transactions	Office of Consumer Counsel
Hope Gas, Inc., d/b/a Dominion Hope	G	West Virginia	01-0330-G-42T 01-0331-G-30C 01-1842-GT-T 01-0685-G-PC	9/01	Revenue Requirements (Rebuttal)	The Consumer Advocate Division of the PSC
Pennsylvania-American Water Company	W	Pennsylvania	R-00016339	9/01	Revenue Requirements (Surrebuttal)	Office of Consumer Advocate
Potomac Electric Power Co. & Delmarva Power	E	Maryland	8890	9/01	Merger Issues and Performance Standards	General Services Administration (GSA)
Comcast Cablevision of Long Beach Island, et al	C	New Jersey	CR01030149-50 CR01050285	9/01	Cable Rates	Division of the Ratepayer Advocate
Kent County Water Authority	W	Rhode Island	3311	8/01	Revenue Requirements	Division of Public Utilities and Carriers
Pennsylvania-American Water Company	W	Pennsylvania	R-00016339	8/01	Revenue Requirements	Office of Consumer Advocate
Roxitcus Water Company	W	New Jersey	WR01030194	8/01	Revenue Requirements Cost of Capital Rate Design	Division of the Ratepayer Advocate
Hope Gas, Inc., d/b/a Dominion Hope	G	West Virginia	01-0330-G-42T 01-0331-G-30C 01-1842-GT-T 01-0685-G-PC	8/01	Revenue Requirements	Consumer Advocate Division of the PSC
Western Resources, Inc.	E	Kansas	01-WSRE-949-GIE	6/01	Restructuring Financial Integrity (Rebuttal)	Citizens' Utility Ratepayer Board
Western Resources, Inc.	E	Kansas	01-WSRE-949-GIE	6/01	Restructuring Financial Integrity	Citizens' Utility Ratepayer Board
Cablevision of Allamuchy, et al	C	New Jersey	CR00100824, etc.	4/01	Cable Rates	Division of the Ratepayer Advocate
Public Service Company of New Mexico	E	New Mexico	3137, Holding Co.	4/01	Holding Company	Office of the Attorney General
Keauhou Community Services, Inc.	W	Hawaii	00-0094	4/01	Rate Design	Division of Consumer Advocacy
Western Resources, Inc.	E	Kansas	01-WSRE-436-RTS	4/01	Revenue Requirements Affiliated Interests (Motion for Suppl. Changes)	Citizens' Utility Ratepayer Board
Western Resources, Inc.	E	Kansas	01-WSRE-436-RTS	4/01	Revenue Requirements Affiliated Interests	Citizens' Utility Ratepayer Board
Public Service Company of New Mexico	E	New Mexico	3137, Part III	4/01	Standard Offer Service (Additional Direct)	Office of the Attorney General
Chem-Nuclear Systems, LLC	SW	South Carolina	2000-366-A	3/01	Allowable Costs	Department of Consumer Affairs

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Southern Connecticut Gas Company	G	Connecticut	00-12-08	3/01	Affiliated Interest Transactions	Office of Consumer Counsel
Atlantic City Sewerage Corporation	WW	New Jersey	WR00080575	3/01	Revenue Requirements Cost of Capital Rate Design	Division of the Ratepayer Advocate
Delmarva Power and Light Company d/b/a Conectiv Power Delivery	G	Delaware	00-314	3/01	Margin Sharing	Division of the Public Advocate
Senate Bill 190 Re: Performance Based Ratemaking	G	Kansas	Senate Bill 190	2/01	Performance-Based Ratemaking Mechanisms	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	G	Delaware	00-463-F	2/01	Gas Cost Rates	Division of the Public Advocate
Waitsfield Fayston Telephone Company	T	Vermont	6417	12/00	Revenue Requirements	Department of Public Service
Delaware Electric Cooperative	E	Delaware	00-365	11/00	Code of Conduct Cost Allocation Manual	Division of the Public Advocate
Commission Inquiry into Performance-Based Ratemaking	G	Kansas	00-GIMG-425-GIG	10/00	Performance-Based Ratemaking Mechanisms	Citizens' Utility Ratepayer Board
Pawtucket Water Supply Board	W	Rhode Island	3164 Separation Plan	10/00	Revenue Requirements	Division of Public Utilities and Carriers
Comcast Cablevision of Philadelphia, L.P.	C	Pennsylvania	3756	10/00	Late Payment Fees (Affidavit)	Kaufman, Lankelis, et al.
Public Service Company of New Mexico	E	New Mexico	3137, Part III	9/00	Standard Offer Service	Office of the Attorney General
Laie Water Company	W	Hawaii	00-0017 Separation Plan	8/00	Rate Design	Division of Consumer Advocacy
El Paso Electric Company	E	New Mexico	3170, Part II, Ph. 1	7/00	Electric Restructuring	Office of the Attorney General
Public Service Company of New Mexico	E	New Mexico	3137 - Part II Separation Plan	7/00	Electric Restructuring	Office of the Attorney General
PG Energy	G	Pennsylvania	R-00005119	6/00	Revenue Requirements	Office of Consumer Advocate
Consolidated Edison, Inc. and Northeast Utilities	E/G	Connecticut	00-01-11	4/00	Merger Issues (Additional Supplemental)	Office of Consumer Counsel
Sussex Shores Water Company	W	Delaware	99-576	4/00	Revenue Requirements	Division of the Public Advocate
Utilicorp United, Inc.	G	Kansas	00-UTCG-336-RTS	4/00	Revenue Requirements	Citizens' Utility Ratepayer Board
TCI Cablevision	C	Missouri	9972-9146	4/00	Late Fees (Affidavit)	Honora Eppert, et al
Oklahoma Natural Gas Company	G	Oklahoma	PUD 990000166 PUD 980000683 PUD 990000570	3/00	Pro Forma Revenue Affiliated Transactions (Rebuttal)	Oklahoma Corporation Commission, Public Utility Division Staff
Tidewater Utilities, Inc. Public Water Supply Co.	W	Delaware	99-466	3/00	Revenue Requirements	Division of the Public Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Delmarva Power and Light Company	G/E	Delaware	99-582	3/00	Cost Accounting Manual Code of Conduct	Division of the Public Advocate
Philadelphia Suburban Water Company	W	Pennsylvania	R-00994868 R-00994877 R-00994878 R-00994879	3/00	Revenue Requirements (Surrebuttal)	Office of Consumer Advocate
Philadelphia Suburban Water Company	W	Pennsylvania	R-00994868 R-00994877 R-00994878 R-00994879	2/00	Revenue Requirements	Office of Consumer Advocate
Consolidated Edison, Inc. and Northeast Utilities	E/G	Connecticut	00-01-11	2/00	Merger Issues	Office of Consumer Counsel
Oklahoma Natural Gas Company	G	Oklahoma	PUD 990000166 PUD 980000683 PUD 990000570	1/00	Pro Forma Revenue Affiliated Transactions	Oklahoma Corporation Commission, Public Utility Division Staff
Connecticut Natural Gas Company	G	Connecticut	99-09-03	1/00	Affiliated Transactions	Office of Consumer Counsel
Time Warner Entertainment Company, L.P.	C	Indiana	48D06-9803-CP-423	1999	Late Fees (Affidavit)	Kelly J. Whiteman, et al
TCI Communications, Inc., et al	C	Indiana	55D01-9709-CP-00415	1999	Late Fees (Affidavit)	Franklin E. Littell, et al
Southwestern Public Service Company	E	New Mexico	3116	12/99	Merger Approval	Office of the Attorney General
New England Electric System Eastern Utility Associates	E	Rhode Island	2930	11/99	Merger Policy	Department of Attorney General
Delaware Electric Cooperative	E	Delaware	99-457	11/99	Electric Restructuring	Division of the Public Advocate
Jones Intercable, Inc.	C	Maryland	CAL98-00283	10/99	Cable Rates (Affidavit)	Cynthia Maisonet and Ola Renee Chatman, et al
Texas-New Mexico Power Company	E	New Mexico	3103	10/99	Acquisition Issues	Office of Attorney General
Southern Connecticut Gas Company	G	Connecticut	99-04-18	9/99	Affiliated Interest	Office of Consumer Counsel
TCI Cable Company	C	New Jersey	CR99020079 et al	9/99	Cable Rates Forms 1240/1205	Division of the Ratepayer Advocate
All Regulated Companies	E/G/W	Delaware	Reg. No. 4	8/99	Filing Requirements (Position Statement)	Division of the Public Advocate
Mile High Cable Partners	C	Colorado	95-CV-5195	7/99	Cable Rates (Affidavit)	Brett Marshall, an individual, et al
Electric Restructuring Comments	E	Delaware	Reg. 49	7/99	Regulatory Policy (Supplemental)	Division of the Public Advocate
Long Neck Water Company	W	Delaware	99-31	6/99	Revenue Requirements	Division of the Public Advocate
Delmarva Power and Light Company	E	Delaware	99-163	6/99	Electric Restructuring	Division of the Public Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Potomac Electric Power Company	E	District of Columbia	945	6/99	Divestiture of Generation Assets	U.S. GSA - Public Utilities
Comcast	C	Indiana	49C01-9802-CP-000386	6/99	Late Fees (Affidavit)	Ken Hecht, et al
Petitions of BA-NJ and NJPA re: Payphone Ops	T	New Jersey	TO97100792 PUCOT 11269-97N	6/99	Economic Subsidy Issues (Surrebuttal)	Division of the Ratepayer Advocate
Montague Water and Sewer Companies	W/WW	New Jersey	WR98101161 WR98101162 PUCRS 11514-98N	5/99	Revenue Requirements Rate Design (Supplemental)	Division of the Ratepayer Advocate
Cablevision of Bergen, Bayonne, Newark	C	New Jersey	CR98111197-199 CR98111190	5/99	Cable Rates Forms 1240/1205	Division of the Ratepayer Advocate
Cablevision of Bergen, Hudson, Monmouth	C	New Jersey	CR97090624-626 CTV 1697-98N	5/99	Cable Rates - Form 1235 (Rebuttal)	Division of the Ratepayer Advocate
Kent County Water Authority	W	Rhode Island	2860	4/99	Revenue Requirements	Division of Public Utilities & Carriers
Montague Water and Sewer Companies	W/WW	New Jersey	WR98101161 WR98101162	4/99	Revenue Requirements Rate Design	Division of the Ratepayer Advocate
PEPCO	E	District of Columbia	945	4/99	Divestiture of Assets	U.S. GSA - Public Utilities
Western Resources, Inc. and Kansas City Power & Light	E	Kansas	97-WSRE-676-MER	4/99	Merger Approval (Surrebuttal)	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	E	Delaware	98-479F	3/99	Fuel Costs	Division of the Public Advocate
Lenfest Atlantic d/b/a Suburban Cable	C	New Jersey	CR97070479 et al	3/99	Cable Rates	Division of the Ratepayer Advocate
Electric Restructuring Comments	E	District of Columbia	945	3/99	Regulatory Policy	U.S. GSA - Public Utilities
Petitions of BA-NJ and NJPA re: Payphone Ops	T	New Jersey	TO97100792 PUCOT 11269-97N	3/99	Tariff Revision Payphone Subsidies FCC Services Test (Rebuttal)	Division of the Ratepayer Advocate
Western Resources, Inc. and Kansas City Power & Light	E	Kansas	97-WSRE-676-MER	3/99	Merger Approval (Answering)	Citizens' Utility Ratepayer Board
Western Resources, Inc. and Kansas City Power & Light	E	Kansas	97-WSRE-676-MER	2/99	Merger Approval	Citizens' Utility Ratepayer Board
Adelphia Cable Communications	C	Vermont	6117-6119	1/99	Late Fees (Additional Direct Supplemental)	Department of Public Service
Adelphia Cable Communications	C	Vermont	6117-6119	12/98	Cable Rates (Forms 1240, 1205, 1235) and Late Fees (Direct Supplemental)	Department of Public Service
Adelphia Cable Communications	C	Vermont	6117-6119	12/98	Cable Rates (Forms 1240, 1205, 1235) and Late Fees	Department of Public Service
Orange and Rockland/ Consolidated Edison	E	New Jersey	EM98070433	11/98	Merger Approval	Division of the Ratepayer Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Cablevision	C	New Jersey	CR97090624 CR97090625 CR97090626	11/98	Cable Rates - Form 1235	Division of the Ratepayer Advocate
Petitions of BA-NJ and NJPA re: Payphone Ops.	T	New Jersey	TO97100792 PUCOT 11269-97N	10/98	Payphone Subsidies FCC New Services Test	Division of the Ratepayer Advocate
United Water Delaware	W	Delaware	98-98	8/98	Revenue Requirements	Division of the Public Advocate
Cablevision	C	New Jersey	CR97100719, 726 730, 732	8/98	Cable Rates (Oral Testimony)	Division of the Ratepayer Advocate
Potomac Electric Power Company	E	Maryland	Case No. 8791	8/98	Revenue Requirements Rate Design	U.S. GSA - Public Utilities
Investigation of BA-NJ IntraLATA Calling Plans	T	New Jersey	TO97100808 PUCOT 11326-97N	8/98	Anti-Competitive Practices (Rebuttal)	Division of the Ratepayer Advocate
Investigation of BA-NJ IntraLATA Calling Plans	T	New Jersey	TO97100808 PUCOT 11326-97N	7/98	Anti-Competitive Practices	Division of the Ratepayer Advocate
TCI Cable Company/ Cablevision	C	New Jersey	CTV 03264-03268 and CTV 05061	7/98	Cable Rates	Division of the Ratepayer Advocate
Mount Holly Water Company	W	New Jersey	WR98020058 PUC 03131-98N	7/98	Revenue Requirements	Division of the Ratepayer Advocate
Pawtucket Water Supply Board	W	Rhode Island	2674	5/98	Revenue Requirements (Surrebuttal)	Division of Public Utilities & Carriers
Pawtucket Water Supply Board	W	Rhode Island	2674	4/98	Revenue Requirements	Division of Public Utilities and Carriers
Energy Master Plan Phase II Proceeding - Restructuring	E	New Jersey	EX94120585U, EO97070457,60,63,66	4/98	Electric Restructuring Issues (Supplemental Surrebuttal)	Division of the Ratepayer Advocate
Energy Master Plan Phase I Proceeding - Restructuring	E	New Jersey	EX94120585U, EO97070457,60,63,66	3/98	Electric Restructuring Issues	Division of the Ratepayer Advocate
Shorelands Water Company	W	New Jersey	WR97110835 PUC 11324-97	2/98	Revenue Requirements	Division of the Ratepayer Advocate
TCI Communications, Inc.	C	New Jersey	CR97030141 and others	11/97	Cable Rates (Oral Testimony)	Division of the Ratepayer Advocate
Citizens Telephone Co. of Kecksburg	T	Pennsylvania	R-00971229	11/97	Alternative Regulation Network Modernization	Office of Consumer Advocate
Consumers Pennsylvania Water Co. - Shenango Valley Division	W	Pennsylvania	R-00973972	10/97	Revenue Requirements (Surrebuttal)	Office of Consumer Advocate
Universal Service Funding	T	New Jersey	TX95120631	10/97	Schools and Libraries Funding (Rebuttal)	Division of the Ratepayer Advocate
Universal Service Funding	T	New Jersey	TX95120631	9/97	Low Income Fund High Cost Fund	Division of the Ratepayer Advocate
Consumers Pennsylvania Water Co. - Shenango Valley Division	W	Pennsylvania	R-00973972	9/97	Revenue Requirements	Office of Consumer Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Delmarva Power and Light Company	G/E	Delaware	97-65	9/97	Cost Accounting Manual Code of Conduct	Office of the Public Advocate
Western Resources, Oneck, and WAI	G	Kansas	WSRG-486-MER	9/97	Transfer of Gas Assets	Citizens' Utility Ratepayer Board
Universal Service Funding	T	New Jersey	TX95120631	9/97	Schools and Libraries Funding (Rebuttal)	Division of the Ratepayer Advocate
Universal Service Funding	T	New Jersey	TX95120631	8/97	Schools and Libraries Funding	Division of the Ratepayer Advocate
Kent County Water Authority	W	Rhode Island	2555	8/97	Revenue Requirements (Surrebuttal)	Division of Public Utilities and Carriers
Ironton Telephone Company	T	Pennsylvania	R-00971182	8/97	Alternative Regulation Network Modernization (Surrebuttal)	Office of Consumer Advocate
Ironton Telephone Company	T	Pennsylvania	R-00971182	7/97	Alternative Regulation Network Modernization	Office of Consumer Advocate
Comcast Cablevision	C	New Jersey	Various	7/97	Cable Rates (Oral Testimony)	Division of the Ratepayer Advocate
Maxim Sewerage Corporation	WW	New Jersey	WR97010052 PUCRA 3154-97N	7/97	Revenue Requirements	Division of the Ratepayer Advocate
Kent County Water Authority	W	Rhode Island	2555	6/97	Revenue Requirements	Division of Public Utilities and Carriers
Consumers Pennsylvania Water Co. - Roaring Creek	W	Pennsylvania	R-00973869	6/97	Revenue Requirements (Surrebuttal)	Office of Consumer Advocate
Consumers Pennsylvania Water Co. - Roaring Creek	W	Pennsylvania	R-00973869	5/97	Revenue Requirements	Office of Consumer Advocate
Delmarva Power and Light Company	E	Delaware	97-58	5/97	Merger Policy	Office of the Public Advocate
Middlesex Water Company	W	New Jersey	WR96110818 PUCRL 11663-96N	4/97	Revenue Requirements	Division of the Ratepayer Advocate
Maxim Sewerage Corporation	WW	New Jersey	WR96080628 PUCRA 09374-96N	3/97	Purchased Sewerage Adjustment	Division of the Ratepayer Advocate
Interstate Navigation Company	N	Rhode Island	2484	3/97	Revenue Requirements Cost of Capital (Surrebuttal)	Division of Public Utilities & Carriers
Interstate Navigation Company	N	Rhode Island	2484	2/97	Revenue Requirements Cost of Capital	Division of Public Utilities & Carriers
Electric Restructuring Comments	E	District of Columbia	945	1/97	Regulatory Policy	U.S. GSA - Public Utilities
United Water Delaware	W	Delaware	96-194	1/97	Revenue Requirements	Office of the Public Advocate
PEPCO/ BGE/ Merger Application	E/G	District of Columbia	951	10/96	Regulatory Policy Cost of Capital (Rebuttal)	GSA

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Western Resources, Inc.	E	Kansas	193,306-U 193,307-U	10/96	Revenue Requirements Cost of Capital (Supplemental)	Citizens' Utility Ratepayer Board
PEPCO and BGE Merger Application	E/G	District of Columbia	951	9/96	Regulatory Policy, Cost of Capital	U.S. GSA - Public Utilities
Utilicorp United, Inc.	G	Kansas	193,787-U	8/96	Revenue Requirements	Citizens' Utility Ratepayer Board
TKR Cable Company of Gloucester	C	New Jersey	CTV07030-95N	7/96	Cable Rates (Oral Testimony)	Division of the Ratepayer Advocate
TKR Cable Company of Warwick	C	New Jersey	CTV057537-95N	7/96	Cable Rates (Oral Testimony)	Division of the Ratepayer Advocate
Delmarva Power and Light Company	E	Delaware	95-196F	5/96	Fuel Cost Recovery	Office of the Public Advocate
Western Resources, Inc.	E	Kansas	193,306-U 193,307-U	5/96	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Princeville Utilities Company, Inc.	W/WW	Hawaii	95-0172 95-0168	1/96	Revenue Requirements Rate Design	Princeville at Hanalei Community Association
Western Resources, Inc.	G	Kansas	193,305-U	1/96	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Environmental Disposal Corporation	WW	New Jersey	WR94070319 (Remand Hearing)	11/95	Revenue Requirements Rate Design (Supplemental)	Division of the Ratepayer Advocate
Environmental Disposal Corporation	WW	New Jersey	WR94070319 (Remand Hearing)	11/95	Revenue Requirements	Division of the Ratepayer Advocate
Lanai Water Company	W	Hawaii	94-0366	10/95	Revenue Requirements Rate Design	Division of Consumer Advocacy
Cablevision of New Jersey, Inc.	C	New Jersey	CTV01382-95N	8/95	Basic Service Rates (Oral Testimony)	Division of the Ratepayer Advocate
Cablevision of New Jersey, Inc.	C	New Jersey	CTV01381-95N	8/95	Basic Service Rates (Oral Testimony)	Division of the Ratepayer Advocate
Chesapeake Utilities Corporation	G	Delaware	95-73	7/95	Revenue Requirements	Office of the Public Advocate
East Honolulu Community Services, Inc.	WW	Hawaii	7718	6/95	Revenue Requirements	Division of Consumer Advocacy
Wilmington Suburban Water Corporation	W	Delaware	94-149	3/95	Revenue Requirements	Office of the Public Advocate
Environmental Disposal Corporation	WW	New Jersey	WR94070319	1/95	Revenue Requirements (Supplemental)	Division of the Ratepayer Advocate
Roaring Creek Water Company	W	Pennsylvania	R-00943177	1/95	Revenue Requirements (Surrebuttal)	Office of Consumer Advocate
Roaring Creek Water Company	W	Pennsylvania	R-00943177	12/94	Revenue Requirements	Office of Consumer Advocate
Environmental Disposal Corporation	WW	New Jersey	WR94070319	12/94	Revenue Requirements	Division of the Ratepayer Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Delmarva Power and Light Company	E	Delaware	94-84	11/94	Revenue Requirements	Office of the Public Advocate
Delmarva Power and Light Company	G	Delaware	94-22	8/94	Revenue Requirements	Office of the Public Advocate
Empire District Electric Company	E	Kansas	190.360-U	8/94	Revenue Requirements	Citizens' Utility Ratepayer Board
Morris County Municipal Utility Authority	SW	New Jersey	MM10930027 ESW 1426-94	6/94	Revenue Requirements	Rate Counsel
US West Communications	T	Arizona	E-1051-93-183	5/94	Revenue Requirements (Surrebuttal)	Residential Utility Consumer Office
Pawtucket Water Supply Board	W	Rhode Island	2158	5/94	Revenue Requirements (Surrebuttal)	Division of Public Utilities & Carriers
US West Communications	T	Arizona	E-1051-93-183	3/94	Revenue Requirements	Residential Utility Consumer Office
Pawtucket Water Supply Board	W	Rhode Island	2158	3/94	Revenue Requirements	Division of Public Utilities & Carriers
Pollution Control Financing Authority of Camden County	SW	New Jersey	SR91111718J	2/94	Revenue Requirements (Supplemental)	Rate Counsel
Roaring Creek Water Company	W	Pennsylvania	R-00932665	9/93	Revenue Requirements (Supplemental)	Office of Consumer Advocate
Roaring Creek Water Company	W	Pennsylvania	R-00932665	9/93	Revenue Requirements	Office of Consumer Advocate
Kent County Water Authority	W	Rhode Island	2098	8/93	Revenue Requirements (Surrebuttal)	Division of Public Utilities and Carriers
Wilmington Suburban Water Company	W	Delaware	93-28	7/93	Revenue Requirements	Office of Public Advocate
Kent County Water Authority	W	Rhode Island	2098	7/93	Revenue Requirements	Division of Public Utilities & Carriers
Camden County Energy Recovery Associates, Inc.	SW	New Jersey	SR91111718J ESW1263-92	4/93	Revenue Requirements	Rate Counsel
Pollution Control Financing Authority of Camden County	SW	New Jersey	SR91111718J ESW 1263-92	4/93	Revenue Requirements	Rate Counsel
Jamaica Water Supply Company	W	New York	92-W-0583	3/93	Revenue Requirements	County of Nassau Town of Hempstead
New Jersey-American Water Company	W/WW	New Jersey	WR92090908J PUC 7266-92S	2/93	Revenue Requirements	Rate Counsel
Passaic County Utilities Authority	SW	New Jersey	SR91121816J ESW0671-92N	9/92	Revenue Requirements	Rate Counsel
East Honolulu Community Services, Inc.	WW	Hawaii	7064	8/92	Revenue Requirements	Division of Consumer Advocacy
The Jersey Central Power and Light Company	E	New Jersey	PUC00661-92 ER91121820J	7/92	Revenue Requirements	Rate Counsel
Mercer County Improvement Authority	SW	New Jersey	EWS11261-91S SR91111682J	5/92	Revenue Requirements	Rate Counsel

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Garden State Water Company	W	New Jersey	WR9109-1483 PUC 09118-91S	2/92	Revenue Requirements	Rate Counsel
Elizabethtown Water Company	W	New Jersey	WR9108-1293J PUC 08057-91N	1/92	Revenue Requirements	Rate Counsel
New Jersey American Water Company	W/WW	New Jersey	WR9108-1399J PUC 8246-91	12/91	Revenue Requirements	Rate Counsel
Pennsylvania-American Water Company	W	Pennsylvania	R-911909	10/91	Revenue Requirements	Office of Consumer Advocate
Mercer County Improvement Authority	SW	New Jersey	SR9004-0264J PUC 3389-90	10/90	Revenue Requirements	Rate Counsel
Kent County Water Authority	W	Rhode Island	1952	8/90	Revenue Requirements Regulatory Policy (Surrebuttal)	Division of Public Utilities & Carriers
New York Telephone	T	New York	90-C-0191	7/90	Revenue Requirements Affiliated Interests (Supplemental)	NY State Consumer Protection Board
New York Telephone	T	New York	90-C-0191	7/90	Revenue Requirements Affiliated Interests	NY State Consumer Protection Board
Kent County Water Authority	W	Rhode Island	1952	6/90	Revenue Requirements Regulatory Policy	Division of Public Utilities & Carriers
Ellesor Transfer Station	SW	New Jersey	SO8712-1407 PUC 1768-88	11/89	Regulatory Policy	Rate Counsel
Interstate Navigation Co.	N	Rhode Island	D-89-7	8/89	Revenue Requirements Regulatory Policy	Division of Public Utilities & Carriers
Automated Modular Systems, Inc.	SW	New Jersey	PUC1769-88	5/89	Revenue Requirements Schedules	Rate Counsel
SNET Cellular, Inc.	T	Connecticut	-	2/89	Regulatory Policy	First Selectman Town of Redding

APPENDIX B

REFERENCED DATA REQUESTS

DPA 1-7

DPA 1-9

DPA 2-1

DPA 2-4

DPA 2-7 (Update)

DPA 2-14

STAFF 1-5

STAFF 1-12

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In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)
Docket No. 09-277T

Department of the Public Advocate (DPA) Set 1 - Due September 29, 2009

DPA 1-7. What is the impact of the Company's rate design proposal on the cost of capital?

Response: The Company has not reflected any impact on the cost of capital as a result of this rate design proposal.

Respondent: Joseph F. Janocha

In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)

Docket No. 09-277T

Department of the Public Advocate (DPA) Set 1 - Due September 29, 2009

DPA 1-9. For each of the past three years, please provide, by customer class, a) the total revenue, b) total distribution revenue, and c) total gas recovery revenue.

Response: Please see table below.

Classification	* R	RSH	Total Residential	GG
12 Months Ended 12/31/2006				
Delivery Revenues w/o Tax	\$2,116,052	\$32,958,089	\$35,074,142	\$15,222,201
GCR w/o Tax	\$3,049,089	\$79,763,517	\$82,812,605	\$46,254,587
Total Booked Revenues	\$5,165,141	\$112,721,606	\$117,886,747	\$61,476,788
12 Months Ended 12/31/2007				
Delivery Revenues w/o Tax	\$2,342,672	\$38,751,279	\$41,093,950	\$17,972,967
GCR w/o Tax	\$2,755,317	\$79,450,989	\$82,206,307	\$45,242,761
Total Booked Revenues	\$5,097,989	\$118,202,268	\$123,300,257	\$63,215,729
12 Months Ended 12/31/2008				
Delivery Revenues w/o Tax	\$2,422,400	\$40,302,169	\$42,724,569	\$18,319,915
GCR w/o Tax	\$2,657,536	\$75,434,234	\$78,091,770	\$42,776,033
Total Booked Revenues	\$5,079,936	\$115,736,403	\$120,816,339	\$61,095,948

* Includes Gas Lighting

Respondent: Joseph F. Janocha

In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)
Docket No. 09-277T
Department of the Public Advocate - Set 2 - Due 10-29-09

DPA 2-1. Does the Company expect that its proposed rate design methodology would have any impact on class cost of service allocations? If so, please describe what impact the Company would expect the rate design methodology to have on the class cost of service allocations.

Response:

No, the proposed rate design is not intended to modify any cost of service allocations. The rate design is actually intended to provide pricing signals which are more reflective of the results of the cost of service. This is accomplished by establishing a customer charge which is entirely based on the classification results of the cost of service study and by establishing a demand charge which is reflective of the fixed costs necessary to serve gas load.

Respondent: Joseph F. Janocha

In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)
Docket No. 09-277T
Department of the Public Advocate - Set 2 - Due 10-29-09

DPA 2-4. Please provide a monthly bill impact distribution showing the impact on distribution charges, by month, separately for a) residential and b) general service customers assuming that the Company's proposal is adopted.

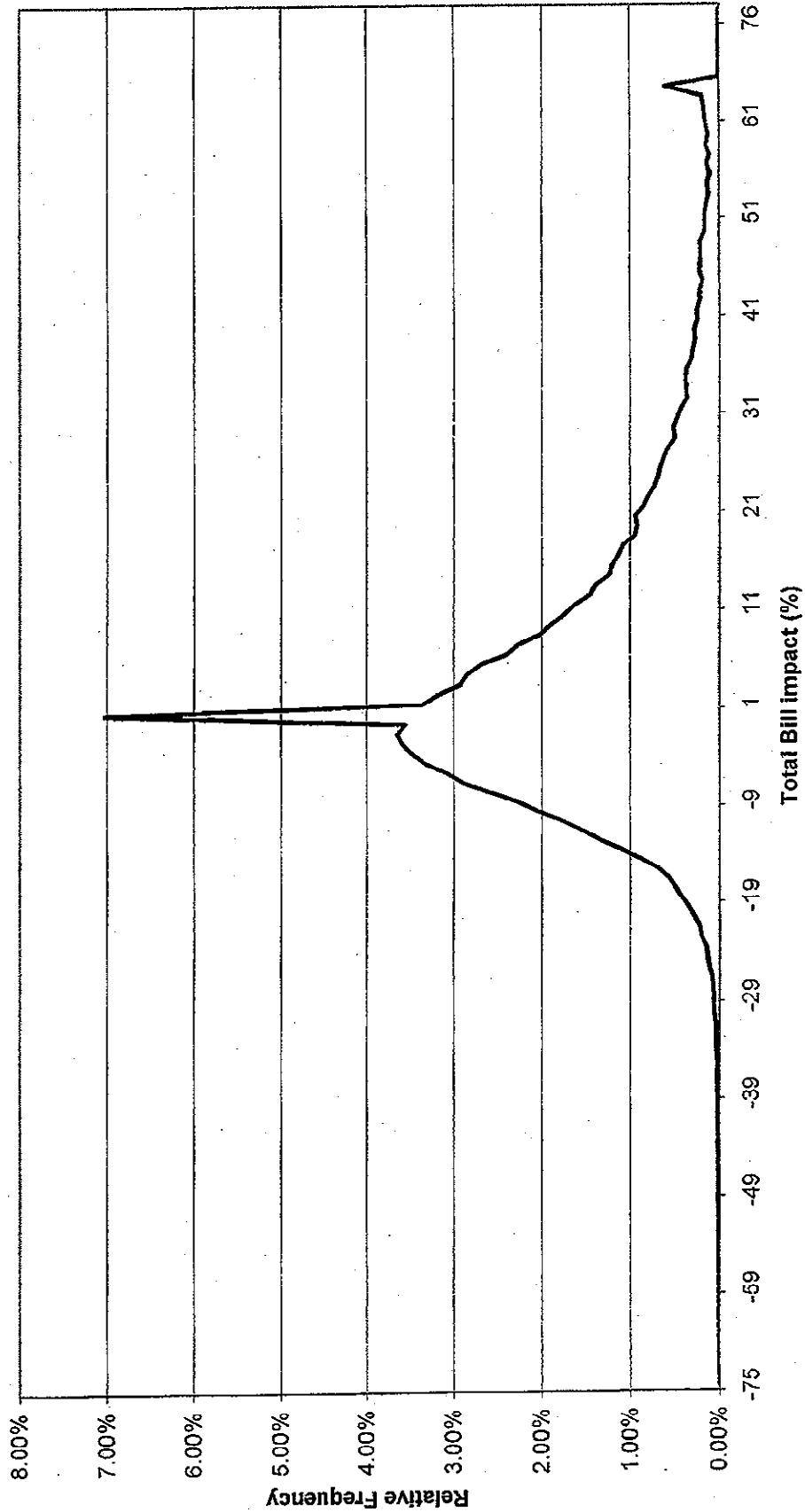
Response:

Refer to the attachment for this response for the residential service classification. As noted in the response to DR 2-3, a comparable analysis for service classifications will be provided in a forthcoming correspondence.

Respondent: Joseph F. Janocha



DPL Delaware - Gas Delivery Service
Residential Service Classification
Design Day Contribution (DDC) Based Delivery Rate Design
Bill Impact Distribution



Delmarva Power & Light - Delaware Gas
DDC Based Gas Delivery Rate Design
Residential Gas Bill Impact
Delivery Bill Impact

DE PSC Docket No. 09-277T
DPA DR 2-4
Attachment
Page 2 of 2

Range of Increase/Decrease (%)	Relative Frequency (%)	Number of Customers	Avg Monthly Bill Impact
<-10%	13.02%	14,350	\$ (7.53)
-6% to -10%	10.86%	11,962	\$ (3.28)
-5% to -6%	3.33%	3,669	\$ (2.18)
-4% to -5%	3.49%	3,845	\$ (1.74)
-3% to -4%	3.60%	3,964	\$ (1.33)
-2% to -3%	3.65%	4,025	\$ (0.93)
-1% to -2%	3.56%	3,917	\$ (0.55)
-1% to 0%	7.03%	7,750	\$ (0.01)
0% to 1%	3.36%	3,705	\$ 0.51
1% to 2%	3.18%	3,509	\$ 0.82
2% to 3%	2.93%	3,223	\$ 1.12
3% to 4%	2.85%	3,135	\$ 1.42
4% to 5%	2.69%	2,969	\$ 1.68
5% to 6%	2.40%	2,648	\$ 1.94
6% to 7%	2.27%	2,500	\$ 2.19
7% to 8%	2.03%	2,234	\$ 2.45
8% to 9%	1.89%	2,080	\$ 2.65
9% to 10%	1.74%	1,918	\$ 2.87
>10%	26.12%	28,773	\$ 4.75
	100.00%		

36%

61%

In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)

Docket No. 09-277T

Department of the Public Advocate - Set 2 - Due 10-29-09

DPA 2-7. Please demonstrate that under the Company's proposal, "monthly bills will be more level throughout the course of the year than under the current rate design", as stated on page 7, lines 12-13 of Mr. Janocha's testimony.

Response:

Refer to the attachment for this response. The attachment shows a monthly bill for a residential heating customer with average monthly use throughout the year, based on test year data from the Company's most recent gas delivery rate case in Docket No. 06-284.

The results reflect the proposed seasonal weighting factors, which actually results in a monthly billing pattern which closely reflects that under the current rates.

Respondent: Joseph F. Janocha

Delmarva Power & Light Company - Delaware
 DDC Based Gas Delivery Rates
 Monthly Bill Comparison
 Average Residential Heating Customer Usage Levels

PSC Docket No. 09-277T
 DPA DR 2-7
 Attachment 1
 Updated 11/12/09

Month	Usage	Existing Rates					Proposed Rates					
		DDC	Customer Charge	Delivery Charge ≤ 50 CCF	Delivery Charge >50 CCF	GCR + ES Rider	Total Bill	Customer Charge	DDC Charge	Recovery Factor	GCR + ES Rider	Total Bill
January	125	9.229456	\$ 9.56	\$ 0.42101	\$0.33784	\$ 1.09987	\$ 184.03	\$ 15.74	\$ 22.27424	16.0%	\$ 1.09987	\$ 186.58
February	114	9.229456	\$ 9.56	\$ 0.42101	\$0.33784	\$ 1.09987	\$ 177.40	\$ 15.74	\$ 22.27424	16.0%	\$ 1.09987	\$ 179.85
March	114	9.229456	\$ 9.56	\$ 0.42101	\$0.33784	\$ 1.09987	\$ 178.21	\$ 15.74	\$ 22.27424	16.0%	\$ 1.09987	\$ 174.48
April	79	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 130.36	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 109.06
May	38	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 67.28	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 63.45
June	23	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 44.44	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 46.93
July	14	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 31.53	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 37.59
August	12	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 28.16	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 35.18
September	13	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 29.21	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 35.92
October	16	9.229456	\$ 9.56	\$ 0.42101	\$0.42101	\$ 1.09987	\$ 34.61	\$ 15.74	\$ 22.27424	2.9%	\$ 1.09987	\$ 39.82
November	45	9.229456	\$ 9.56	\$ 0.42101	\$0.33784	\$ 1.09987	\$ 77.69	\$ 15.74	\$ 22.27424	16.0%	\$ 1.09987	\$ 97.91
December	102	9.229456	\$ 9.56	\$ 0.42101	\$0.33784	\$ 1.09987	\$ 159.75	\$ 15.74	\$ 22.27424	16.0%	\$ 1.09987	\$ 160.36

In the Matter of the Application of Delmarva Power and Light Company
For Approval of a Modified Fixed Variable Rate Design For
Natural Gas Rates (Filed June 25, 2009)

Docket No. 09-277T

Department of the Public Advocate - Set 2 - Due 10-29-09

DPA 2-14. Please provide the basis for the distribution of the Proposed DDC Recovery revenue proposed in JFJ-4, page 2.

Response:

The proposed recovery schedule is based on a number of factors. It recognizes the fixed nature of delivery-related costs and establishes an annual rate to be recovered in monthly increments. It also attempts to address the revenue and intra-class subsidy issues created by customers who seasonally disconnect service. To address this issue, the recovery schedule was developed by evaluating the current level of gas delivery revenues received by the Company during the heating months of November through March. (Refer to the attachment for this response.) To assure that heating customers who seasonally disconnect service contribute appropriately to the recovery of fixed annual costs, the recovery schedule was developed which increases the percentage of overall annual recovery in the winter months.

Respondent: Joseph F. Janocha

DPL - Delaware Gas
Summary of Residential Service Gas Delivery Revenue
12 Months Ending February 2009

Docket No. 09-277T
DPA DR 2-14
Attachment

Gas Delivery Revenue	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Total
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Gas Delivery Revenue	\$ 5,718,088	\$ 3,998,429	\$ 2,480,880	\$ 2,005,758	\$ 1,860,038	\$ 1,821,418	\$ 1,828,072	\$ 1,898,024	\$ 3,148,295	\$ 5,870,149	\$ 6,773,824	\$ 7,007,484	\$ 43,606,479
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Revenue	\$ 28,317,849
November - March	\$ 15,288,830
April - October	

% of Total	64.64%
Avg Monthly %	12.90%
	7.01%

IN THE MATTER OF THE APPLICATION OF DELMARVA POWER & LIGHT
COMPANY FOR APPROVAL OF A MODIFIED FIXED VARIABLE RATE
DESIGN FOR NATURAL GAS RATES (Filed June 25, 2009)
DOCKET NO. 09-277T

DELAWARE PUBLIC SERVICE COMMISSION - STAFF'S SET 1
Due September 29, 2009

Staff 1-5: Please provide an outline, summary or listing of the educational program(s) the Company will use to introduce, implement, explain or detail the proposed rate design should that design be approved by the Commission. Also explain how the proposed program will be coordinated with existing customer information efforts and/or the new programs cited in paragraph 6 of the Application.

Response:

The Company has not developed a detailed educational program to introduce, implement, explain or detail the proposed rate design proposed in this Application. Depending on the outcome of this proceeding, the Company will work with Staff and DPA in developing educational materials to explain the modified fixed variable rate design to Customers.

Respondent: Joseph F. Janocha

**IN THE MATTER OF THE APPLICATION OF DELMARVA POWER & LIGHT
COMPANY FOR APPROVAL OF A MODIFIED FIXED VARIABLE RATE
DESIGN FOR NATURAL GAS RATES (Filed June 25, 2009)
DOCKET NO. 09-277T**

**DELAWARE PUBLIC SERVICE COMMISSION - STAFF'S SET 1
Due September 29, 2009**

Staff 1-12: Please provide the Excel worksheet (with all inputs, formulas, macros and graphics intact) that generates or produces JFJ-3.

Response:

See Response to Staff 1-6.

In the preparation of the response to Staff 1-6, it was identified that the data used to develop the illustrative Design Day contribution for Service Classification GG provided in JFJ-3 was based on 2008-2009 billing data, rather than 2005-2006 test year data. The file named "2009-09-04 Gas JFJ-1 to JFJ-4 DDC Rate Design - Attach. Staff 1-6.xls" included in response to Staff 1-6 includes the appropriate test year data for Service Classification GG.

Updated versions of JFJ-3 and page 2 of JFJ-4 are provided in the attachment titled, "2009-09-29 DDC Rate Data - Attach. Staff 1-12.pdf".

Respondent: Joseph F. Janocha

Delmarva Power & Light Company - Delaware

DDC Based Gas Delivery Rates

Development of Aggregate Design Day Contribution Factor

Schedule JFJ-3

		Residential	GG
1	Sates Jan - Feb (MCF)	2,651,035	1,404,523
2	Customers Jan-Feb	110,804	9,301
3	August Monthly Sales (MCF)	133,602	121,103
4	August Average Daily Usage (MCF) = Line 3/31	4,310	3,907
5	Customers - August	109,225	9,097
6	Non-Heating Usage (MCF) = Line 4 / Line 5 x (31 + 28) x Line 2	257,965	235,682
7	Heating Usage (MCF) = Line 1 - Line 6	2,393,070	1,168,840
8	Heating Degree Days	1,589	1,589
9	Heating Usage per Degree Day per Customer (=Line 7 / Line 8 / Line 2)	0.01359	0.07909
10	Design Day Degrees	65	65
11	Peak Day Heating Usage = Line 2 x Line 9 x Line 10	97,893	47,814
12	Peak Day Non Heating Usage = Line 6 / (31+ 28)	4,372	3,995
13	Design Day Contribution (MCF) = Line 11 + Line 12	102,266	51,808
14	Design Day Contribution per Customer (MCF) =Line 13 / Line 2	0.92295	5.57019

Delmarva Power & Light Company - Delaware
DDC Based Gas Delivery Rates
General Gas Service Rate Design

Schedule JFJ-4
Page 2 of 2

Total \$ 16,567,364
Customer \$ 5,170,620
Demand \$ 11,396,744

Rate Element	Billing Determinants	Existing Rate Design		Billing Determinants	Proposed Rate Design	
		Existing Rate	Existing Revenue		Recommended Rate	Recommended Revenue
Customer Charge (\$ per month)						
GG	110,067	\$27.31 \$	3,005,930	110,067	46.63 \$	5,132,346
GVFT	119	\$302.31 \$	35,975	119	321.63 \$	38,274
					\$	\$ 5,170,620
First 750 CCF Commodity Rate	20,840,431 \$	0.34975 \$	7,288,941			
Over 750 CCF Commodity Rate	23,871,842 \$	0.26125 \$	6,236,519			
Design Day Contribution Rate (\$ per CCF of DDC per Month)				518,084 \$	1.83316 \$	11,396,764
Total			\$ 16,567,364		\$	\$ 16,567,384